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EC 1/20/20

4 Attorney for Defendant  
5 Adam L. Polson

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

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9 CHAMPERY RENTAL REO, LLC, a  
California Limited Liability Company,  
10 Plaintiff,

Civil No. 3:19-cv-00529-MMD-CBC

11 vs.  
12 ADAM L. POLSON; et. al.  
Defendant.

13 SECOND STIPULATION TO STAY  
14 PROCEEDINGS IN ORDER TO ALLOW  
SETTLEMENT DISCUSSIONS TO PROCEED

15 AND ALL RELATED ACTIONS

16 COME NOW Defendant, Adam Polson, by and through his attorney, Michael Lehnert,  
17 Esq; Third Party Defendant, Reno Vista Master Property Owners Association ("Reno  
18 Vista"), by and through its attorney, Sophie Karadanis, Esq. of Leach, Kern, Gruchow,  
19 Anderson, Song, and Plaintiff Champery Rental REO, LLC, by and through its attorney,  
20 Matthew K. Schriever, Esq. of Hutchinson & Steffen, PLLC; Defendant United States (Internal  
Revenue Service) by and through its attorney Boris Kukso, Esq. and stipulate as follows:

21 1. On April 27, 2020 Reno Vista filed a motion to dismiss Mr. Polson's third party  
complaint (ECF 45). On May 6, 2020 Mr. Polson filed his response (ECF 48). On May 13,  
2020 Reno Vista filed its reply (ECF 49). The motion has not yet been ruled upon.

22 2. On May 21, 2020 Plaintiff filed a motion for summary judgment against Mr.  
Polson (ECF 51). Mr. Polson's response is due on June 11, 2020.

23 3. On May 22, 2020 the United States filed a motion for summary judgment against  
the Plaintiff (ECF 52). The Plaintiff's response is due June 12, 2020.

1       4. On June 2, 2020 this Court approved a stipulation between the Plaintiff and  
2 Reno Vista to extend the time to conduct depositions to August 31, 2020 (ECF 54).

3       5. On June 8, 2020, the parties entered into a stipulation and order that stayed  
4 matters until July 31, 2020 for the purposes of furthering settlement discussions (ECF 57 &  
5 58).

6       6. The parties have reached a tentative settlement agreement. Counsel for Defendant  
7 Polson has agreed to draft the term sheet and the agreement.

8       7. The parties hereby request that this matter be stayed through September 30, 2020  
9 in order to see if the parties can reach a global settlement. Should the matter not settle, then the  
10 parties would request that the deadlines to file responses to the pending summary judgment  
11 motions be extended to October 15, 2020.

12      Dated: 7/30/20

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14      Michael Lehnert, Esq.  
15      Attorney for Adam Polson

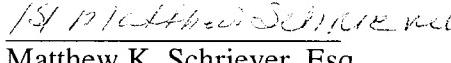
16      Dated: 7/30/20

17        
18      Sophie Karadanis, Esq.  
19      Attorney for Reno Vista

20      Dated: 7/30/20

21        
22      Boris Kukso, Esq.  
23      Attorney for United States

24      Dated: 7/30/20

25        
26      Matthew K. Schriever, Esq.  
27      Attorney for Champery Rental REO

28      Dated: 7/30/2020

29      IT IS SO ORDERED.

30      

31      Miranda M. Du,  
32      Chief U. S. District Judge